

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

In re:

Brandon M. Chasen, Sr.

Debtor(s)

Bankr. Case No.: 25-15437-NVA

(Chapter 7)

MOTION FOR ENTRY OF CONSENT ORDER RE: TURNOVER

Zvi Guttman, Chapter 7 Trustee, by counsel, files this Motion for Entry of Consent Order Re: Turnover, and states:

1. This case was commenced by the filing of an involuntary petition for relief under Chapter 7 of the Bankruptcy Code on June 16, 2025. On July 11, 2025, the Debtor filed a Motion to Convert Involuntary Chapter 7 to Voluntary Chapter 7 [Dkt. 2]. That Motion was granted on July 29, 2025 [Dkt. 29].

2. Zvi Guttman has been appointed as the Chapter 7 trustee (the "Trustee").

3. Among the Debtor's scheduled assets are certain funds held in an attorney escrow account maintained by the law firm of Baker Donelson. See, Schedule A/B-21. The Scheduled value of asset is \$283,000 (the "Escrow"). The current balance in the escrow account is \$89,580.95 (the "Escrow Balance");

4. The Debtor and the Trustee disagree over the genesis of, ownership of, and the Debtor's claim of exemption in, the Escrow;

5. Baker Donelson is a neutral stakeholder of the Escrow Balance pending resolution of the competing claims thereto; and

6. The parties agree that Baker Donelson should be relieved of the continuing obligation to hold onto the Escrow Balance and that the Escrow Balance should be turned over to the Trustee subject to the terms of the Consent Order attached hereto.

WHEREFORE, the Trustee respectfully requests that the Court enter the Consent Order attached hereto and grant such other and further relief as is just and proper.

/s/ Zvi Guttman

Zvi Guttman (06902)

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